

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH MOLINA, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:17-cv-2498 AGF
v.)	
)	
CITY OF ST. LOUIS, MISSOURI, et al.,)	
)	
Defendants.)	

DECLARATION OF STEPHEN HOULDSWORTH

I, Stephen Houldsworth, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.

2. On December 31, 2014, I saw St. Louis Metropolitan Police Department officers deploy pepper spray against people they perceived to be expressing an anti-law enforcement view in order to retaliate against them for that perceived view and chill them from publicly expressing it.

3. On that date, I saw SLMPD officers deploy pepper spray against people who were unarmed, non-threatening, nonviolent, and not engaged in any crime.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 12th day of August, 2020

By: /s/ Stephen Houldsworth
Stephen Houldsworth